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10 Attorneys for Defendant
11 Twitter, Inc.

12 UNITED STATES DISTRICT COURT
13
14 NORTHERN DISTRICT OF CALIFORNIA
15
16 SAN FRANCISCO DIVISION

17 JOHN DOE, A MINOR CHILD, BY AND
THROUGH HIS NEXT FRIEND JANE DOE,

18 Plaintiff,

19 v.

20 TWITTER, INC.,

21 Defendant.

Case No. 3:21-cv-00485-JCS

**DECLARATION OF KYLE C. WONG IN
SUPPORT OF STIPULATION AND
[PROPOSED] ORDER ON DEFENDANT'S
RESPONSE TO THE COMPLAINT, CONSENT
FOR AMENDED COMPLAINT, AND MOTION
TO DISMISS BRIEFING SCHEDULE**

Judge: Hon. Joseph C. Spero
Trial Date: Not yet set

1 I, Kyle C. Wong, declare as follows:

2 1. I am an attorney licensed to practice law in California and am special counsel at
3 Cooley, LLP and counsel of record for Defendant Twitter, Inc. in this matter. I make this
4 declaration based on my personal knowledge of this matter and information I obtained following a
5 reasonable investigation of the events described below. If called as a witness, I could and would
6 testify competently to the matters stated herein.

7 2. I submit this declaration pursuant to Civil Local Rule 6-2(a) and in support of the
8 Parties' Stipulation and Proposed Order to re Defendant's Response to the Complaint and Motion
9 Dismiss Briefing Schedule.

10 3. Plaintiff John Doe, by and through his next friend Jane Doe ("Plaintiff"), filed the
11 Complaint in the above-entitled action in U.S. District Court for the Northern District of California
12 on January 20, 2021;

13 4. The Complaint asserts eleven counts, including violation of the Trafficking Victims
14 Protection Reauthorization Act, 18 U.S.C. §§ 1591 and 1595, violation of the duty to report child
15 sexual abuse, 18 U.S.C. § 2258A, receipt and distribution of child pornography, 18 U.S.C. § 2252A,
16 California products liability, negligence, gross negligence, negligence per se, negligent infliction
17 of emotion distress, distribution of private sexually explicit materials, Cal. Civ. Code § 1708.85,
18 intrusion into private affairs, invasion of privacy under the California Constitution, Article 1,
19 Section 1;

20 5. Defendant was served with the Complaint on January 22, 2021;

21 6. Defendant's deadline to respond to the Complaint is February 12, 2021;

22 7. The Parties believe that given the number of counts at issue and breadth of claims
23 asserted, the briefing schedule agreed to in the Parties' stipulation will allow for a fuller and more
24 orderly presentation of the arguments;

25 8. The Initial Case Management Conference in this matter is set for April 23, 2021;

26 9. The Parties agree that continuing the Case Management Conference to May 14,
27 2021, will allow the Court the benefit of the full briefing of the issues of the case;

28 10. This modification would not affect the case schedule as none has been entered;

1 11. The Parties have not previously requested an extension.

2 I declare under penalty of perjury that the foregoing is true and correct. This declaration
3 was executed on February 10, 2021 in San Francisco, California.

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5 Dated: February 10, 2021

6 /s/ Kyle C. Wong

7 Kyle C. Wong
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